

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 6/17/96 Time start _____ Time finish _____
Name of Inspector Heather Bouch
Company, installation name University of Pennsylvania
Location 3451 Walnut St. Phila PA 19104
County Phila Municipality Phila
Identification number ~~XXXXXXXXXX~~ PAD042250712
Name of responsible official Kyle Rosato
Title Industrial Hygienist
Mailing Address DEHS 1408 Blockley Hall Phila PA 19104-6021
Area code and telephone number (215) 898-4453
Name of person interviewed _____
Title SAME
Mailing address (if different from above) _____
Area code and telephone number _____

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a. ~2700 kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
		Flanders, NJ transfer facility
Too many to list.	AETG/Chem Waste Mgmt	

4. Source Reduction: ☐ accomplished, ☒ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Univ of Penn ID Number PA06 42256712 Date 6/17/96

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
X				PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
X				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
X				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H016
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
X				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
X				h). Proper containment and collection system(s)	265.178	H023
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

UNIV OF Penn
PAD# 42250712
6/17/96

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
X				Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
X				Special requirements followed for international shipments	262.50, .53, .55, .60	H032
X				Source reduction strategy prepared and available	262.80	H033

INSPECTION REPORT COMMENTS

Date of Inspection 6/17/96 Identification Number PAD 042250712

Company/Facility/Site Name University of Pennsylvania

A large quantity generator of hazardous waste inspection was performed at the above referenced facility. Present during the inspection were Roger Savage and Heather Bouch of the Department and Kyle Rosato of University of Pennsylvania (UPenn).

UPenn generates a wide variety of hazardous wastes from the laboratories on campus and at campus facilities. At the time of the inspection AETS, the off-site transporter was onsite lab packing the wastes generated from the end of the school year cleanup.

All drums in the transport truck were labeled properly, and the staging area had proper secondary containment and sufficient spill clean-up materials.

The records were reviewed.

No violations observed.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date _____

Inspector (signature) Heather Bouch

Date 6/29/96

**Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist**

6/17/16 University of Pennsylvania

PA DØ42258712

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation 40 CFR Part 268
1	2	3	4			
				Generators		
X				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
X				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
X				Dilution not used as a substitute for treatment.		3
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
X	X			Storage Facilities		
				Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
				Containers marked to identify contents and accumulation date.		50(a)(2)
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				Treatment Facilities, including PBR and RRR Facilities		
				Dilution not used as a substitute for treatment.		3
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				Land Disposal Facilities		
				Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
				Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
				Facility retains copies of generator notifications and certifications.		7(c)(1)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
TRANSPORTERS - PART A

Date of Inspection 6/17/96 Time start _____ Time finish _____
Name of Inspector Heather Bouch
Company, installation name Univ of Pennsylvania
Location 3451 Walnut St. Phila PA 19104
County Phila Municipality Phila
Identification number PAD 0422 56712
Name of responsible official Kyle Rosato
Title Industrial Hygienist
Mailing Address DEHS 1408 Blockley Hall Phila PA 19104-6021
Area code and telephone number (215) 898-4453
Name of person interviewed _____
Title SAME
Mailing address (if different from above) _____
Area code and telephone number _____

1. a. Pa hazardous waste transporter (HWT) license number PA-AH 5192
b. Expiration date 3/31/98

2. Hazardous waste handling: ☒ N/A
a. ☐ Blending, ☐ Mixing
b. ☐ Storage ☐ Treatment ☐ Disposal
c. ☐ Use, ☐ Reuse ☐ Recycle ☐ Reclaim

3. Does the transporter generate hazardous wastes? ☒ Yes ☐ No

4. Types of hazardous waste produced by Hazardous Waste Number:

To many to list. Lab packed materials handled
by AETS at facility in
Flanders, NJ

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
TRANSPORTERS- PART B

Site Name PA Univ of Penn ID Number PAD 42256712 Date 6/17/96

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
X				Identification number	263.11	H500
X				Company licensed by PA DER	263.13(a)	H501
X				License conditions met: License card on vehicle	403 SWMA	H502
X				License conditions met: PPC plan on vehicle	403 SWMA	H503
X				License conditions met: Insurance card on vehicle	403 SWMA	H504
X				Waste accepted only from generators with ID numbers except as provided in §261.5, 261.6 and 263.30	263.11(c)	H505
		X		Properly completed manifest accompanies all shipments	263.20(a)	H506
		X		Required number of copies of the manifest accompanies shipment	263.20(c)	H507
		X		Entire quantity delivered as stated on manifest	263.21(a)	H508
		X		Undeliverable shipment procedures followed	263.21(b)	H509
		X		Shipments comply with U.S. and PA DOT requirements	263.21(c)	H510
X				Only normal in-transit storage of waste	263.23(b)	H511
X				Records retained at designated location	263.22	H512
X				Contingency plan approved and implemented for discharge or spills	263.30(f-h)	H513
X				Appropriate and adequate safety equipment carried on transport vehicle	263.31(b)	H514
		X		Equipment decontamination procedures followed	263.31(c)	H515
		X		Contaminated washwater, waste solutions, residues disposed of in accordance with regulations	263.31(c)	H516
	X			Sufficient absorbent material in vehicle when transporting liquids in containers of 100 gallons or less	263.31(d)	H517
X				Bond and insurance amounts sufficient	263.32(c)	H518

Onsite manifests used by Univ. of Penn, but not reviewed during the inspection.
Offsite manifests were ~~not~~ inspected.

INSPECTION REPORT COMMENTS

Date of Inspection 6/17/96 Identification Number PAD 042250712
Company/Facility/Site Name University of Pennsylvania Lic. # PA AH 5192

A hazardous waste transporter inspection was performed at the above referenced facility. Present during the inspection were Roger Savage and Heather Boneh of the Department and Kyle Rosato of University of Pennsylvania (UPenn).

UPenn has a hazardous waste transporter license to enable them to collect hazardous wastes from various locations on their campus which are connected by public highways/streets. They are considered a small handler. The University has purchased a new vehicle which they will be using to transport wastes on campus as soon as they have outfitted it properly.

No violations observed.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____
Inspector (signature) [Signature] Date 6/29/96

**Hazardous Waste Inspection Report
Generators - Part A**

Date of inspection 7/15/93 Time start 9:30am Time finish 11:30am
 Name of inspector Roger Savagel
 Company, installation name University of Pennsylvania
 Location 3451 Walnut St., Phila., PA 19104
 County Phila. Municipality Phila.
 Identification number PA17042250712
 Name of responsible official Kyle Rosato
 Title Industrial Hygienist
 Mailing address OEAS/1408 Blockley Hall, Phila., PA, 19104-
 Area code and telephone number (215) 898-4453 6021
 Name of person interviewed same
 Title same
 Mailing address (if different from above) same
 Area code and telephone number same

1. Current waste handling method:

- | | | | | | |
|----|--|-------------------------------------|-----------------------------------|--|---|
| a. | <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. | <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. | <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. | <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input checked="" type="checkbox"/> recycle, | <input checked="" type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. ~ 2700 kg./mo.
 b. ~ 35000 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>too many</u>	<u>clean Harbors</u>	<u>Natick, MA</u>
<u>to list</u>	<u>clean Harbors</u>	<u>Baldmore, MA</u>
	<u>Connecticut Treatment Co., Connecticut</u>	
	<u>clean Harbors</u>	<u>Braintree, MA</u>

Hazardous Waste Inspection Report
Generators — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			262
X				Hazardous waste determination, copies available		.11
X				Identification number		.12(a)
X				Hazardous waste shipments offered only to licensed transporters		.12(d)
X				Authorization received from TSD facility for wastes shipped off-site		.13
X				PA manifest used for intrastate shipments		.20(b)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		.20(c)
X				Manifests filled out properly and completely		.20(g)
X				Manifests routed properly and within time limits (7 days)		.23(e, f)
X				Proper U.S. DOT shipping containers or packages		.30(1)
X				Shipping containers marked and labeled according to U.S. DOT		.30(2)
X				Containers of 110 gal. or less marked with required PA label		.30(3)
		X		Placards offered to transporter		.33
X				Wastes accumulated on-site for less than 90 days		.34(1)
X				Wastes stored in proper containers and properly marked and labeled		.34(2)
X				Containers managed in accordance with 75.265(q)(1)–(9)		.34(3)
X				Containers clearly marked with accumulation date and visible for inspection		.34(4)
X				Records retained at designated location for 20 years		.40
X				Quarterly reports submitted to the Department		.41
X				Exception reporting procedures followed		.42
	X			Hazardous waste disposal plan, if required		.45
X				Spill reporting procedures followed		.46(a)
X				Preparedness, Prevention and Contingency Plan and implemented		.46(e)
X				Special requirements followed for international shipments		.50.53.55.60
X				On the job or classroom personnel training program 265.16		.34(a)(5)
X				Drum accumulation area inspected weekly as per 265.174		.34(a)(3)

**Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist**

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non Compliance
Status					REQUIREMENT	Citation	
1	2	3	4	40 CFR Part 268			
					Generators		
X					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
X					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
X					Dilution not used as a substitute for treatment.	3	
X					Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)	
	X				Storage Facilities		
					Facility verifies generators classification of waste in accordance with waste analysis plan.	25 Pa Code 265.13(c)	
					Containers marked to identify contents and accumulation date.	50(a)(2)	
					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
					Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)	
					Treatment Facilities, including PBR and RRR Facilities		
					Dilution not used as a substitute for treatment.	3	
					Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)	
					Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)	
					Land Disposal Facilities		
					Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)	
					Facility land disposes of restricted waste only if it meets applicable treatment standard.	40	
	V				Facility retains copies of generator notifications and certifications.	7(c)(1)	

Inspection Report Comments

Date of Inspection 7/15/93 Identification Number PAD042250712
Company/Facility/Site Name University of Pennsylvania

Permission to conduct a routine inspection was given by Kyle Rosato. The containment area in the consolidated waste facility has been completed.

All containers were marked with an accumulation date & UPC code.

No violations were observed.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) [Signature] Date 7/15/93
Inspector (signature) [Signature] Date 7/15/93
Page 4 of 4

Hazardous Waste Inspection Report
Transporters - Part A

Date of inspection 7/15/93 Time start 9:30 am Time finish 11:30 am
Name of inspector Roger Savage
Company name Trustees of the University of Pennsylvania
Location 3451 Walnut St., Phila., PA 19104
County Phila. Municipality Phila.
Identification number PAD042250712
Name of responsible official Kyle Rosato
Title Industrial Hygienist
Mailing address 2015 Locust St., 1408 Blockley Hall, Phila., PA 19104-6021
Area code and telephone number (215) 898-4453
Name of person interviewed Kyle Rosato
Title Same
Mailing address (if different from above) Same
Area code and telephone number Same

1. a. Pa hazardous waste transporter (HWT) license number PA-AH 5192
b. Expiration date 03-31-94

2. Hazardous waste handling: ☒ N/A

a. ☐ Blending, ☐ Mixing
b. ☐ Storage, ☐ Treatment ☐ Disposal
c. ☐ Use, ☐ Reuse ☐ Recycle ☐ Reclaim

3. Does the transporter generate hazardous wastes? ☐ Yes ☒ No

4. Types of hazardous waste produced by Hazardous Waste Number: N/A

5. Are hazardous wastes transported into the Commonwealth from abroad? ☐ Yes ☒ No

Hazardous Waste Inspection Report
Transporters - Part B

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.263
X				Identification number		(b)
X				Company licensed by PA DER.		(c)
X				Copy of license kept on vehicles transporting hazardous wastes.		(c)(8)(iv)
X				Licensee transporting only wastes conditioned on the license.		(d)
X				Manifest accompanies all shipments. *		(d)
X				Required number of copies of the manifest accompanies shipment. *		(d)(9)(i)
X				Shipments comply with U.S. and PA DOT requirements.		(d)(9)(ii)
X				Entire quantity, as stated on the manifest, delivered. *		(d)(9)(iii)
X				Undeliverable shipment procedures following.		(d)(10)
X				Normal in-transit storage of waste (only if specified on the manifest). *		(e)(2)
X				Records retained at designated location.		(f)
X				Contingency plan approved and implemented.		(g)(6)
X				Appropriate and adequate safety equipment carried on transport vehicle.		(h)(2)
X				Equipment decontamination procedures followed.		(h)(3)
X				Contaminated washwater, waste solutions, residues disposed of in accordance with regulations.		(h)(3)
X				Sufficient absorbent material in vehicle when transporting liquids in containers of 100 gallons or less.		(h)(4)
				*For the purposes of this inspection, "manifest" will mean the facility's modified Hazardous waste manifest. (see attached)		

Inspection Report Comments

Date of Inspection 7/15/93 Identification Number PA-AH 5192Company/Facility/Site Name University of Pennsylvania

Permission to conduct a routine transporter inspection was given by Kyle Rozato.

The University of Pennsylvania presently generates hazardous waste at various sites within the campus. The waste is transported from the various locations on campus to the Consolidated Waste Facility which is also on campus. The transporter must drive on public roads in order to transport waste from the point of generation to the Consolidated Waste Facility. A modified manifest is used in lieu of a PA state manifest.

The Department may waive the manifesting requirements in this particular situation.

No violations observed.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) Kyle Rozato Date 7/15/93Inspector (signature) [Signature] Date 7/15/93
Page 3 of 3

Internal Waste Manifest: Lab Pack Chemicals

PAD042250712

Trustees of the University of Pennsylvania

OEHS/ 1408 Blockley Hall

Philadelphia PA 19104-6021

(215) 898-4453

Kyle Rosato or Matthew D. Finucane, Director

PAAHS192

University of Pennsylvania

Consolidated Waste Facility

401 Guardian Drive, Philadelphia PA

Date: _____

[illegible]

PA Small Handler's Permit Number:
Designated Storage Facility Location:

Mixed Waste Chemicals

PAD042250712
Trustees of the University of Pennsylvania
OEHS/ 1408 Blockley Hall
Philadelphia PA 19104-6021
(215) 898-4453
Kyle Rosato or Matthew D. Finucane, Director
PAAHS192
University of Pennsylvania
Consolidated Waste Facility
401 Guardian Drive, Philadelphia PA

Number	Date	Bldg.	Room
Quant.	Unit	P.I.	Ext.

Compound	√	Qty.	Compound	√	Qty.	Compound	Qty.
Acetone			Methylene Chloride				
Acetonitrile			N-Methylimidazole				
Chloroform			N-Methylpyrrolidone				
Dichloroacetic Acid			Tetrazole				
Ethanol			Toluene				
Ethyl Acetate			Trifluoroacetic Acid				
Hexane			Water				
Methanol			Xylene				
Location:							

Number	Date	Bldg.	Room
Quant.	Unit	P.I.	Ext.

Compound	✓	Qty.	Compound	✓	Qty.	Compound	Qty.
Acetone			Methylene Chloride				
Acetonitrile			N-Methylimidazole				
Chloroform			N-Methylpyrrolidone				
Dichloroacetic Acid			Tetrazole				
Ethanol			Toluene				
Ethyl Acetate			Trifluoroacetic Acid				
Hexane			Water				
Methanol			Xylene				
Location:							

limited

TCLP

EPA GEN

EVALUATION - VIOLATION - ENFORCEMENT FORM

Handler ID Number		Handler Type	
PAID 042250712		LDF [] TSF [] INC [] LQG [X] SQG [] CEG [] TRA [X]	
Handler Name		Contact Name	Date Submitted
University of Pennsylvania		Kyle Rosato	07/15/93
Street		City	
3451 Walnut Street		Phila, PA 19104	

EVALUATION		Add [X]	Change []	Delete []		
Date	Number	Agency	Type	Reason	Branch	Person
07/15/93		S	CEI		WM	RLS

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated - NA - Not Applicable)

GER []	GPT [E]	GBF []	TWD [E]	DGS []	DLT []	DPB []	DWP []
GGR [E]	GRR [E]	TGR [E]	DCH []	DGW []	DMC []	DPP []	DBF []
GLB [E]	GSC []	TMR [E]	DCL []	DIN []	DMR []	DSI []	CAS []
GMR [E]	GSQ []	TOR [E]	DCP []	DLB []	DOR []	DTR []	FEA []
GOR [E]	GEX [E]	TRR []	DFR []	DLF []	DOT []	DTT []	CSS []

Comments Transporter license # PA-AH5192

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined
[]	[]	[]	[]	[]	[]	[]	[]
[]	[]	[]	[]	[]	[]	[]	[]
[]	[]	[]	[]	[]	[]	[]	[]
[]	[]	[]	[]	[]	[]	[]	[]
[]	[]	[]	[]	[]	[]	[]	[]

VIOLATION		Add []	Change []	Delete []	Link to Above Evaluation? (Y/N) []	
Agency	Number	Area	Class	Regulation Type	Regulation Citation	
[]	[]	[]	[]	[]	[]	
Date Determined		Priority	Branch	Person	Returned to Compliance	
[]		[]	[]	[]	Scheduled	Actual
[]		[]	[]	[]	[]	[]
Comments []						

VIOLATION		Add []	Change []	Delete []	Link to Above Evaluation? (Y/N) []	
Agency	Number	Area	Class	Regulation Type	Regulation Citation	
[]	[]	[]	[]	[]	[]	
Date Determined		Priority	Branch	Person	Returned to Compliance	
[]		[]	[]	[]	Scheduled	Actual
[]		[]	[]	[]	[]	[]
Comments []						

☐ Required ☐ Required if pertinent ☐ Required only for previously reported data ☐ Not Required by EPA

Handler ID Number				Handler Name			
<div style="display: flex; justify-content: space-between;"> VIOLATION Add Change Delete </div>				Link to Above Evaluation? (Y/N)			
Agency	Number	Area	Class	Regulation Type	Regulation Citation		
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>		
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled		Actual
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>
Comments <input type="text"/>							

<div style="display: flex; justify-content: space-between;"> VIOLATION Add Change Delete </div>				Link to Above Evaluation? (Y/N)			
Agency	Number	Area	Class	Regulation Type	Regulation Citation		
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>		
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled		Actual
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>
Comments <input type="text"/>							

<div style="display: flex; justify-content: space-between;"> VIOLATION Add Change Delete </div>				Link to Above Evaluation? (Y/N)			
Agency	Number	Area	Class	Regulation Type	Regulation Citation		
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>		
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled		Actual
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>
Comments <input type="text"/>							

<div style="display: flex; justify-content: space-between;"> ENFORCEMENT Add Change Delete </div>							
Date	Number	Agency	Type	Branch	Person	Attorney Initials	
<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	
Penalty Assessed \$				Settled \$			
<input type="text"/>				<input type="text"/>			
POLLUTION PREVENTION ENFORCEMENT COMPONENTS COVERED BY THIS ACTION							
PPE - Pollution Prevention <input type="checkbox"/>				EAE - Environmental Auditing <input type="checkbox"/>			
PRE - Pollution Reduction <input type="checkbox"/>				EPE - Environmental Public Awareness <input type="checkbox"/>			
ERE - Environmental Restoration <input type="checkbox"/>							
VIOLATIONS COVERED BY ABOVE ENFORCEMENT ACTION							
Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
PENALTY PAYMENTS							
Date		Amount		Date		Amount	
<input type="text"/>		<input type="text"/>		<input type="text"/>		<input type="text"/>	
<input type="text"/>		<input type="text"/>		<input type="text"/>		<input type="text"/>	
Comments <input type="text"/>							

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection 7/15/93 Time start 9:30 am Time finish 11:30 am
 Name of inspector Roger Savaght
 Company, installation name University of Pennsylvania
 Location 3451 Walnut St., Phila., PA 19104
 County Phila. Municipality Phila.
 Identification number PA17042250712
 Name of responsible official Kyle Rosato
 Title Industrial Hygienist
 Mailing address OEA 5/1408 Blockley Hall, Phila., PA, 19104-
 Area code and telephone number (215) 898-4453 6021
 Name of person interviewed Same
 Title Same
 Mailing address (if different from above) Same
 Area code and telephone number Same

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a. ~ 2700 kg./mo.
 b. ~ 35000 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>too many</u>	<u>Clean Harbors</u>	<u>Natick, MA</u>
<u>to 1197</u>	<u>Clean Harbors</u>	<u>Baldmore, MA</u>
	<u>Connecticut Treatment Corp.</u>	<u>Connecticut</u>
	<u>Clean Harbors</u>	<u>Braintree, MA</u>



Hazardous Waste Inspection Report
Generators – Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			262
X				Hazardous waste determination, copies available		.11
X				Identification number		.12(a)
X				Hazardous waste shipments offered only to licensed transporters		.12(d)
X				Authorization received from TSD facility for wastes shipped off-site		.13
X				PA manifest used for intrastate shipments		.20(b)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		.20(c)
X				Manifests filled out properly and completely		.20(g)
X				Manifests routed properly and within time limits (7 days)		.23(e, f)
X				Proper U.S. DOT shipping containers or packages		.30(1)
X				Shipping containers marked and labeled according to U.S. DOT		.30(2)
X				Containers of 110 gal. or less marked with required PA label		.30(3)
		X		Placards offered to transporter		.33
X				Wastes accumulated on-site for less than 90 days		.34(1)
X				Wastes stored in proper containers and properly marked and labeled		.34(2)
X				Containers managed in accordance with 75.265(q)(1)–(9)		.34(3)
X				Containers clearly marked with accumulation date and visible for inspection		.34(4)
X				Records retained at designated location for 20 years		.40
X				Quarterly reports submitted to the Department		.41
X				Exception reporting procedures followed		.42
	X			Hazardous waste disposal plan, if required		.45
X				Spill reporting procedures followed		.46(a)
X				Preparedness, Prevention and Contingency Plan and implemented		.46(e)
X				Special requirements followed for international shipments		.50.53.55.60
X				On the job or classroom personnel training program 265.16		.34(a)(5)
X				Drum accumulation area inspected weekly as per 265.174		.34(a)(3)

Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable				3-Not Determined				4-Non-Compliance			
Status				REQUIREMENT								Citation 40 CFR Part 268			
1	2	3	4												
				Generators											
X				Notification sent with shipments of wastes that do not meet treatment standards.								7(a)(1)			
X				Notification and certification sent with shipments of wastes meeting treatment standards.								7(a)(2)			
X				Dilution not used as a substitute for treatment.								3			
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.								7(a)(5), (a)(6)			
	X			Storage Facilities											
				Facility verifies generators classification of waste in accordance with waste analysis plan.								25 Pa Code 265.13(c)			
				Containers marked to identify contents and accumulation date.								50(a)(2)			
				Notification sent with shipments of wastes that do not meet treatment standards.								7(a)(1)			
				Notification and certification sent with shipments of wastes meeting treatment standards.								7(a)(2)			
				Facility maintains records of documents produced pursuant to LDR requirements.								7(a)(6)			
				Treatment Facilities, Including PBR and RRR Facilities											
				Dilution not used as a substitute for treatment.								3			
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.								7(b)			
				Certification and/or notification sent with shipments of waste.								7(b)(4), (b)(5), (b)(6)			
				Land Disposal Facilities											
				Facility tests wastes received to assure compliance with applicable treatment standards.								7(c)(2)			
				Facility land disposes of restricted waste only if it meets applicable treatment standard.								40			
	V			Facility retains copies of generator notifications and certifications.								7(c)(1)			

Inspection Report Comments

Date of Inspection 7/15/93 Identification Number PAD042250712
Company/Facility/Site Name University of Pennsylvania

Permission to conduct a routine inspection was given by Kyle Rosato. The containment area in the consolidated waste facility has been completed.

All containers were marked with an accumulation date & UPC code.

No violations were observed.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) [Signature] Date 7/15/93
Inspector (signature) [Signature] Date 7/15/93
Page 4 of 4

Hazardous Waste Inspection Report
Transporters - Part A

Date of inspection 7/15/93 Time start 9:30 am Time finish 11:30 am
Name of inspector Roger Savage
Company name Trustees of the University of Pennsylvania
Location 3451 Walnut St., Phila. PA 19104
County Phila. Municipality Phila.
Identification number PA7042250712
Name of responsible official Kyle Rosato
Title Industrial Hygienist
Mailing address OE HS 1406 Blockley Hall, Phila, PA 19104-602
Area code and telephone number (215) 898-4453
Name of person interviewed Kyle Rosato
Title same
Mailing address (if different from above) same
Area code and telephone number same

1. a. Pa hazardous waste transporter (HWT) license number PA-AH 5192
b. Expiration date 03-31-94

2. Hazardous waste handling: ☒ N/A

- a. ☐ Blending, ☐ Mixing
b. ☐ Storage, ☐ Treatment ☐ Disposal
c. ☐ Use, ☐ Reuse ☐ Recycle ☐ Reclaim

3. Does the transporter generate hazardous wastes? ☐ Yes ☒ No

4. Types of hazardous waste produced by Hazardous Waste Number: N/A

5. Are hazardous wastes transported into the Commonwealth from abroad? ☐ Yes ☒ No

Hazardous Waste Inspection Report
Transporters — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.263
X				Identification number		(b)
X				Company licensed by PA DER.		(c)
X				Copy of license kept on vehicles transporting hazardous wastes.		(c)(8)(iv)
X				Licensee transporting only wastes conditioned on the license.		(d)
X				Manifest accompanies all shipments. *		(d)
X				Required number of copies of the manifest accompanies shipment. *		(d)(9)(i)
X				Shipments comply with U.S. and PA DOT requirements.		(d)(9)(ii)
X				Entire quantity, as stated on the manifest, delivered. *		(d)(9)(iii)
X				Undeliverable shipment procedures following.		(d)(10)
X				Normal in-transit storage of waste (only if specified on the manifest). *		(e)(2)
X				Records retained at designated location.		(f)
X				Contingency plan approved and implemented.		(g)(6)
X				Appropriate and adequate safety equipment carried on transport vehicle.		(h)(2)
X				Equipment decontamination procedures followed.		(h)(3)
X				Contaminated washwater, waste solutions, residues disposed of in accordance with regulations.		(h)(3)
X				Sufficient absorbent material in vehicle when transporting liquids in containers of 100 gallons or less.		(h)(4)
				* For the purposes of this inspection, "manifest" will mean the facility's modified Hazardous waste manifest. (see attached)		

Inspection Report Comments

Date of Inspection 7/15/93 Identification Number PA-AH 5192
Company/Facility/Site Name University of Pennsylvania

Permission to conduct a routine transporter inspection was given by Kyle Rosato.

The University of Pennsylvania presently generates hazardous waste at various sites within the campus. The waste is transported from the various locations on campus to the Consolidated Waste Facility which is also on campus. The transporter must drive on public roads in order to transport waste from the point of generation to the Consolidated Waste Facility. A modified manifest is used in lieu of a PA state manifest.

The Department may waive the manifesting requirements in this particular situation.

No violations observed.

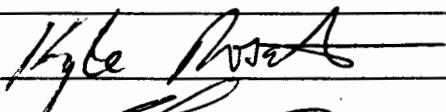
In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

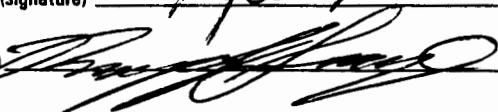
Person Interviewed (signature)



Date

7/15/93

Inspector (signature)



Date

7/15/93

Page

3 of 3

Internal Waste Manifest:	Lab Pack Chemicals
EPA Generator ID #:	PAD042250712
Generator Name & Mailing Address:	Trustees of the University of Pennsylvania OEHS/ 1408 Blockley Hall Philadelphia PA 19104-6021
Generator Phone & Contact:	(215) 898-4453 Kyle Rosato or Matthew D. Finucane, Director
PA Small Handler's Permit Number:	PAAHS192
Designated Storage Facility Location:	University of Pennsylvania Consolidated Waste Facility 401 Guardian Drive, Philadelphia PA

PAD042250712

Trustees of the University of Pennsylvania

Philadelphia PA 19104-6021

(215) 898-4453

Kyle Rosato or Matthew D. Finucane, Director

PAAHS192

University of Pennsylvania

Consolidated Waste Facility

401 Guardian Drive, Philadelphia PA

Date: _____

[illegible]

EPA Generator ID #:
Generator Name & Mailing Address:

Generator Phone & Contact:

PA Small Handler's Permit Number:
Designated Storage Facility Location:

Mixed Waste Chemicals

PAD042250712
Trustees of the University of Pennsylvania
OEHS/ 1408 Blockley Hall
Philadelphia PA 19104-6021
(215) 898-4453
Kyle Rosato or Matthew D. Finucane, Director
PAAHS192
University of Pennsylvania
Consolidated Waste Facility
401 Guardian Drive, Philadelphia PA

Number	Date	Bldg.	Room
Quant.	Unit	P.I.	Ext.

Compound	✓	Qty.	Compound	✓	Qty.	Compound	Qty.
Acetone			Methylene Chloride				
Acetonitrile			N-Methylimidazole				
Chloroform			N-Methylpyrrolidone				
Dichloroacetic Acid			Tetrazole				
Ethanol			Toluene				
Ethyl Acetate			Trifluoroacetic Acid				
Hexane			Water				
Methanol			Xylene				
Location:							

Number	Date	Bldg.	Room
Quant.	Unit	P.I.	Ext.

Compound	√	Qty.	Compound	√	Qty.	Compound	Qty.
Acetone			Methylene Chloride				
Acetonitrile			N-Methylimidazole				
Chloroform			N-Methylpyrrolidone				
Dichloroacetic Acid			Tetrazole				
Ethanol			Toluene				
Ethyl Acetate			Trifluoroacetic Acid				
Hexane			Water				
Methanol			Xylene				
Location:							

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			262
X				Hazardous waste determination, copies available		.11
X				Identification number		.12(a)
X				Hazardous waste shipments offered only to licensed transporters		.12(d)
X				Authorization received from TSD facility for wastes shipped off-site		.13
X				PA manifest used for intrastate shipments		.20(b)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		.20(c)
X				Manifests filled out properly and completely		.20(g)
X				Manifests routed properly and within time limits (7 days)		.23(e) or (f)
			X	Proper U.S. DOT shipping containers or packages		.30(1)
			X	Shipping containers marked and labeled according to U.S. DOT		.30(2)
			X	Containers of 110 gal. or less marked with required PA label		.30(3)
		X		Placards offered to transporter		.33
X				Wastes accumulated on-site for less than 90 days		.34(1)
			X	Wastes stored in proper containers and properly marked and labeled		.34(2)
			X	Containers managed in accordance with 265.171-.177		.34(3)
			X	Containers clearly marked with accumulation date and visible for inspection		.34(4)
X				Records retained at designated location for 20 years		.40
X				Quarterly reports submitted to the Department		.41
X				Exception reporting procedures followed		.42
	X			Hazardous waste disposal plan, if required		.45
X				Spill reporting procedures followed		.46(a)
X				Preparedness, Prevention and Contingency Plan and implemented		.46(e)
X				Special requirements followed for international shipments		50.53.55.60
X				On the job or classroom personnel training program 265.16		.34(a)(5)
X				Drum accumulation area inspected weekly as per 265.174		.34(a)(3)

Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT	Citation	
1	2	3	4		40 CFR Part 268	
				Generators		
X				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
X				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
X				Dilution not used as a substitute for treatment.	3	
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)	
	X			Storage Facilities		
				Facility verifies generators classification of waste in accordance with waste analysis plan.	25 Pa Code 265.13(c)	
				Containers marked to identify contents and accumulation date.	50(a)(2)	
				Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
				Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
				Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)	
				Treatment Facilities, including PBR and RRR Facilities		
				Dilution not used as a substitute for treatment.	3	
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)	
				Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)	
				Land Disposal Facilities		
				Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)	
				Facility land disposes of restricted waste only if it meets applicable treatment standard.	40	
	V			Facility retains copies of generator notifications and certifications.	7(c)(1)	

Inspection Report Comments

Date of Inspection 3/25/93 Identification Number PAD042250712
Company/Facility/Site Name University of Pennsylvania

Permission to conduct an inspection was given by Kyle Rosato.

Waste is generated primarily from laboratory facilities and engineering facilities. Hazardous waste was being stored in the Consolidate Waste Facility and in the outdoor containment units. The waste stored inside the Consolidate Waste Facility was not within a containment area. One drum inside the building was not labeled and marked with an accumulation date. Wastes stored on shelves were without accumulation dates and not within containers.

At least three drums within the Hazardous Waste Containment Units were not marked with accumulation dates.

The storage area inside the building should be labeled as a hazardous waste storage area to warn unknowing persons.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) Kyle Rosato

Date

Inspector (signature) [Signature]

Date

3/25/93
Page 14 of 5





COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
FIELD OPERATIONS - WASTE MANAGEMENT
Suite 6010 Lee Park
555 North Lane
Conshohocken, PA 19428

March 30, 1993

Certified Mail:

Kyle A. Rosato
University of Pennsylvania
Office of Environmental Health and Safety
1408 Blockley Hall
Philadelphia, PA 19104-6021

Re: Hazardous Waste Inspection
March 25, 1993 PADO42250712
City of Philadelphia
Philadelphia County

NOTICE OF VIOLATION

Dear Mr. Rosato:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 260 through 267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

\$262.34.(a)(2). Accumulation. A generator may accumulate a hazardous waste onsite without a permit for 90 days or less if the waste is placed in containers which meet United States Department of Transportation packing, marking, and labeling requirements in §§262.30 and 262.33.

Wastes stored on shelves in the Consolidate Waste Facility were not placed in containers meeting the requirements of §262.34.

\$262.34.(a)(3). Accumulation. A generator may accumulate hazardous waste onsite without a permit for 90 days or less if containers are managed in accordance with Chapter 265 Subchapter I.

The wastes stored in the Consolidate Waste Facility were not within a secondary containment area meeting the requirements of Chapter 265 Subchapter I.

\$262.34.(a)(4). Accumulation. A generator may accumulate hazardous waste onsite without a permit for 90 days or less if on each container, each date on which any hazardous waste was placed in the container shall be clearly marked and visible for inspection.



Inspection Report Comments

Date of Inspection 3/25/93 Identification Number PA17042250712
Company/Facility/Site Name University of Pennsylvania

Containers should be arranged so that the labels can be easily read.

The University of Pennsylvania has a small handler's hazardous waste transporter license (PAAHS192). The vehicle transports waste throughout the campus. Mr. Bosato stated that the license is not used to transport waste to a TSD facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)



Date

3/25/93

Inspector (signature)



Date

3/25/93Page 9 of 9

One metal drum containing hazardous waste oil and wastes stored on shelves and in the cabinet, all of which were located in the Consolidate Waste Facility, were without accumulation dates. At least three drums in the hazardous waste containment units were without accumulation dates. The labels on many of the drums in the hazardous waste containment units were not clearly visible for inspection.

Each listed violation item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this notice as a reference to obtain a detailed description of compliance requirements.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for the abatement of these violations.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at (215) 832-6212.

Sincerely yours,



ROGER L. SAVAGE
Waste Management Specialist

cc: Regional
Compliance
EPA
C.O.

MAY - 3 1993

331

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection 5/4/93 Time start 1:45 pm Time finish 2:30
 Name of inspector Roger Savage
 Company, installation name University of Pennsylvania
 Location 3451 Walnut St., Phila, PA 19104
 County Phila. Municipality Phila.
 Identification number PAD042250712
 Name of responsible official Kyle Rosato
 Title Industrial Hygienist
 Mailing address DEHS/1406 Blockley Hall, Phila, PA 19104-6021
 Area code and telephone number (215) 898-4453
 Name of person interviewed Same
 Title Same
 Mailing address (if different from above) Same
 Area code and telephone number Same

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☒ reclaim

b H₂

b fuel blend

2. Amount of hazardous waste produced:

- a. ~2700 kg./mo.
 b. ~35000 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>see many</u>	<u>Clean Harbors</u>	<u>Natick, MA</u>
<u>to list</u>	<u>Clean Harbors</u>	<u>Baltimore, MD</u>
	<u>Connecticut Treatment Corp.</u>	<u>Connecticut</u>
	<u>Clean Harbors</u>	<u>Braintree, MA</u>

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			262
X				Hazardous waste determination, copies available		.11
X				Identification number		.12(a)
		X		Hazardous waste shipments offered only to licensed transporters		.12(d)
		X		Authorization received from TSD facility for wastes shipped off-site		.13
		X		PA manifest used for intrastate shipments		.20(b)
		X		Disposer state manifest or EPA format manifest used for out-of-state shipments		.20(c)
		X		Manifests filled out properly and completely		.20(g)
		X		Manifests routed properly and within time limits (7 days)		.23(e) or (f)
X				Proper U.S. DOT shipping containers or packages		.30(1)
X				Shipping containers marked and labeled according to U.S. DOT		.30(2)
X				Containers of 110 gal. or less marked with required PA label		.30(3)
		X		Placards offered to transporter		.33
X				Wastes accumulated on-site for less than 90 days		.34(1)
X				Wastes stored in proper containers and properly marked and labeled		.34(2)
X				Containers managed in accordance with 265.171-.177		.34(3)
X				Containers clearly marked with accumulation date and visible for inspection		.34(4)
		X		Records retained at designated location for 20 years		.40
		X		Quarterly reports submitted to the Department		.41
		X		Exception reporting procedures followed		.42
	X			Hazardous waste disposal plan, if required		.45
X				Spill reporting procedures followed		.46(a)
		X		Preparedness, Prevention and Contingency Plan and implemented		.46(e)
		X		Special requirements followed for international shipments		50.53.55.60
		X		On the job or classroom personnel training program 265.16		.34(a)(5)
X				Drum accumulation area inspected weekly as per 265.174		.34(a)(3)

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation
1	2	3	4			40 CFR Part 268
				Generators		
		X		Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
		X		Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
		X		Dilution not used as a substitute for treatment.		3
		X		Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
		X		Storage Facilities		
				Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
				Containers marked to identify contents and accumulation date.		50(a)(2)
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				Treatment Facilities, including PBR and RRR Facilities		
				Dilution not used as a substitute for treatment.		3
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				Land Disposal Facilities		
				Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
				Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
				Facility retains copies of generator notifications and certifications.		7(c)(1)

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Inspection Report Comments

Date of Inspection 5/4/93 Identification Number PAD042250712Company/Facility/Site Name University of Pennsylvania

Permission to conduct a follow-up inspection was given by Kyle Rosato.

All violations noted during the 3/25/93 inspection have been corrected.

A secondary containment has been installed in the Consolidated Waste Facility and the floor has been sealed.

No violations were observed.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) Kyle RosatoDate 5/4/93Inspector (signature) Thomas J. HaysDate 5/4/93Page 4 of 4